FILED

# UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

DEC 6 2016

U.S. DISTRICT COURT-WVND WHEELING, WV 26003

UNITED STATES OF AMERICA,

Plaintiff,

V.

STEVEN ROBINSON, a/k/a "H", TERARD ANSOR. BRITTANY BROOKS, TIARA ADAMS. STEPHANIE EDMONDS, MARK HANSHAW, BRANDI KERN, JOSEPH KILLIAN. BRANDON FRENCH, AMANDA MARSHALL, WAYNE KEGLEY, **GARFIELD MISSENIS,** MICHELLE ZIMMERMAN, DONNA MILLER. LARRY STINSON, JR., DANIELLE EY, CHARLES WRIGHT, and **HOLLY HOPKINS** 

Criminal No. 31.10-CR-50

Violations: 18 U.S.C. § 2

18 U.S.C. § 1952(a)(3) 18 U.S.C. § 1956(h) 21 U.S.C. § 841(a)(1) 21 U.S.C. § 841(b)(1)(A) 21 U.S.C. § 841(b)(1)(C) 21 U.S.C. § 843(b) 21 U.S.C. § 843(d)

21 U.S.C. § 846 21 U.S.C. § 853

# **INDICTMENT**

The Grand Jury charges that:

#### **COUNT ONE**

# (Conspiracy to Distribute Heroin)

1. From on or about August 20, 2015 to on or about the date of the return of the Indictment, in Berkeley and Jefferson Counties, within the Northern Judicial District of West Virginia, and elsewhere, Defendants STEVEN ROBINSON, a/k/a "H", TERARD ANSOR, BRITTANY BROOKS, TIARA ADAMS, STEPHANIE EDMONDS, MARK

HANSHAW, BRANDI KERN, JOSEPH KILLIAN, BRANDON FRENCH, AMANDA MARSHALL, WAYNE KEGLEY, GARFIELD MISSENIS, MICHELLE ZIMMERMAN, DONNA MILLER, LARRY STINSON, JR., DANIELLE EY, CHARLES WRIGHT, and HOLLY HOPKINS did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding together with each other, and with persons known and unknown to the Grand Jury to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute, and to distribute, at least one kilogram of heroin, a Schedule I controlled substance.

#### MANNER AND MEANS OF THE CONSPIRACY

- 2. The primary purpose of the conspiracy was to profit economically from the trafficking of heroin throughout the Northern District of West Virginia and elsewhere through the manner and means described below.
- 3. It was part of the conspiracy that members would undertake different roles and tasks, which included distributor, redistributor, and courier of heroin and currency.
- 4. If was further part of the conspiracy that co-conspirators would obtain heroin from Defendants **STEVEN ROBINSON**, a/k/a "H", and/or **TERARD ANSOR** in and around Baltimore, Maryland, and thereafter distribute that heroin in the Northern District of West Virginia, deriving substantial gross receipts from their unlawful enterprise.
- 5. As part of the conspiracy, co-conspirators would routinely travel to Maryland from the Northern District of West Virginia to obtain heroin from Defendants **STEVEN ROBINSON**, a/k/a "H", and/or **TERARD ANSOR**. During these trips, individuals would give **STEVEN ROBINSON**, a/k/a "H", and/or **TERARD ANSOR** cash or other substances

in exchange for heroin. These co-conspirators would then return to the Northern District of West Virginia to redistribute the heroin.

- 6. Defendant **BRITTANY BROOKS** would rent vehicles for Defendant **STEVEN ROBINSON**, a/k/a "H", for use in their unlawful enterprise.
- 7. Defendant **TIARA ADAMS** would collect currency derived from their unlawful enterprise and deposit that currency into various accounts.
- 8. Defendant STEVEN ROBINSON, a/k/a "H", controlled and managed the organization. Co-conspirators would communicate with Defendants STEVEN ROBINSON, a/k/a "H", and/or TERARD ANSOR by telephone. Co-conspirators would advise Defendants STEVEN ROBINSON, a/k/a "H", and/or TERARD ANSOR that the co-conspirator was interested in purchasing heroin. Co-conspirators would advise Defendants STEVEN ROBINSON, a/k/a "H", and/or TERARD ANSOR by telephone when they reached the intersection of Interstate 70 and Interstate 695. Defendants STEVEN ROBINSON, a/k/a "H", and/or TERARD ANSOR would provide co-conspirators with directions to a location to complete the transaction.
- 9. On March 11, 2016, co-conspirators Larry Stinson, Jr., and Danielle Ey brought approximately 19.9 grams of heroin into the Northern District of West Virginia after purchasing that heroin from Defendants **STEVEN ROBINSON**, a/k/a "H."
- 10. On June 6, 2016, co-conspirators Garfield Missenis and Michelle Zimmerman brought approximately 59 grams of heroin into the Northern District of West Virginia after purchasing that heroin from Defendants STEVEN ROBINSON, a/k/a "H", and/or TERARD ANSOR.

- 11. On June 23, 2016, co-conspirators Wayne Kegley and Donna Miller brought approximately 39.7 grams of heroin into the Northern District of West Virginia after purchasing that heroin from Defendants **STEVEN ROBINSON**, a/k/a "H", and/or **TERARD ANSOR**.
- 12. As part of the conspiracy, Defendants and others distributed in excess of one kilogram of heroin, with an illegal street value in excess of \$300,000.

#### **OVERT ACTS**

- 13. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following over acts, among others, were committed in the Northern District of West Virginia and elsewhere:
  - a. On or about August 20, 2015, **TERARD ANSOR** distributed a quantity of heroin to a person known to the Grand Jury for \$360.
  - b. On or about November 4, 2015, **TERARD ANSOR** distributed a quantity of heroin to a person known to the Grand Jury for \$300.
  - c. On or about December 10, 2015, **STEVEN ROBINSON, a/k/a "H"**, distributed a quantity of heroin to a person known to the Grand Jury for \$3,000.
  - d. On or about March 11, 2016, **STEVEN ROBINSON**, a/k/a "H", possessed a distribution quantity of heroin.
  - e. On or about March 15, 2016, Defendant **GARFIELD MISSENIS** distributed heroin to a person known to the Grand Jury for \$100.

- f. On or about April 20, 2016, **STEVEN ROBINSON**, a/k/a "H", distributed a quantity of heroin to a person known to the Grand Jury for \$400.
- g. On or about June 6, 2016, **STEVEN ROBINSON**, a/k/a "H", possessed a distribution quantity of heroin.
- h. On or about May 16, 2016, Defendant **GARFIELD MISSENIS** distributed heroin to a person known to the Grand Jury for a PlayStation.
- i. On or about June 6, 2016, Defendants GARFIELD MISSENIS and MICHELLE ZIMMERMAN, possessed a distribution quantity of heroin.
- j. On or about June 23, 2016, **STEVEN ROBINSON**, a/k/a "H", possessed a distribution quantity of heroin.
- k. On or about June 23, 2016, Defendants WAYNE KEGLEY and DONNAMILLER, possessed a distribution quantity of heroin.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

#### **COUNT TWO**

(Travel Act – Promotion)

- 1. On or about December 10, 2015, in Berkeley County, in the Northern District of West Virginia, and elsewhere Defendant, **STEVEN ROBINSON**, did cause a person known to the Grand Jury to travel in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about December 10, 2015, Defendant, STEVEN ROBINSON, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, involving the Controlled Substances Act offense charged in Count One of this Indictment, that is, the Defendant, STEVEN ROBINSON, distributed a quantity of heroin, in exchange for \$3,000 in United States Currency; in violation of Title 18, United States Code, Section 1952(a)(3).

# **COUNT THREE**

(Unlawful Use of Communication Facility)

On or about March 7, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, LARRY STINSON, JR., did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, LARRY STINSON, JR., used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

## COUNT FOUR

(Interstate Travel in Aid of Racketeering)

- 1. On or about March 7, 2016, Defendant, LARRY STINSON, JR., traveled in interstate commerce between the States of Maryland and West Virginia with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about March 7, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, LARRY STINSON, JR., did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendant, LARRY STINSON, JR., conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Section 1952(a)(3).

# **COUNT FIVE**

(Unlawful Use of Communication Facility)

On or about March 9, 2016 in Berkeley County, in the Northern District of West Virginia, Defendant **GARFIELD MISSENIS** did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, **GARFIELD MISSENIS**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

# **COUNT SIX**

(Unlawful Use of Communication Facility)

On or about March 9, 2016 in Berkeley County, in the Northern District of West Virginia, Defendant **MICHELLE ZIMMERMAN** did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant **MICHELLE ZIMMERMAN** used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

# **COUNT SEVEN**

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

- 1. On or about March 9, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about March 9, 2016, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

# **COUNT EIGHT**

(Unlawful Use of Communication Facility)

On or about March 10, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, CHARLES WRIGHT, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, CHARLES WRIGHT, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

# **COUNT NINE**

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

- 1. On or about March 10, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **CHARLES WRIGHT** and **HOLLY HOPKINS**, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about March 10, 2016, Defendants, CHARLES WRIGHT and HOLLY HOPKINS, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, CHARLES WRIGHT and HOLLY HOPKINS, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

# **COUNT TEN**

(Unlawful Use of Communication Facility)

On or about March 11, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, LARRY STINSON, JR., did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count Three of this Indictment, that is Defendant, LARRY STINSON, JR., used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

#### **COUNT ELEVEN**

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

- 1. On or about March 11, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, LARRY STINSON, JR. and DANIELLE EY, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about March 11, 2016, Defendants, LARRY STINSON, JR. and DANIELLE EY, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, LARRY STINSON, JR. and DANIELLE EY, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

# **COUNT TWELVE**

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about March 11, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, Defendants, **STEVEN ROBINSON**, **a/k/a** "H", **LARRY STINSON**, **JR.**, and **DANIELLE EY**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

# **COUNT THIRTEEN**

(Distribution of Heroin)

On or about March 15, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, **GARFIELD MISSENIS**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance, to a person known to the Grand Jury, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### COUNT FOURTEEN

(Unlawful Use of Communication Facility)

On or about April 18, 2016, in Jefferson County, West Virginia, in the Northern District of West Virginia, and elsewhere, Defendant, JOSEPH KILLIAN, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, JOSEPH KILLIAN, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

#### **COUNT FIFTEEN**

(Interstate Travel in Aid of Racketeering)

- 1. On or about April 18, 2016, in Jefferson County, in the Northern District of West Virginia, Defendant, JOSEPH KILLIAN, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about April 18, 2016, Defendant, **JOSEPH KILLIAN**, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendant, **JOSEPH KILLIAN**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Section 1952(a)(3).

# COUNT SIXTEEN

(Travel Act – Promotion)

- 1. On or about April 20, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere Defendant, **STEVEN ROBINSON**, did cause a person known to the Grand Jury to travel in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about April 20, 2016, Defendant, **STEVEN ROBINSON**, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, involving the Controlled Substances Act offense charged in Count One of this Indictment, that is, the Defendant, **STEVEN ROBINSON**, distributed a quantity of heroin, in exchange for \$400 in United States Currency; in violation of Title 18, United States Code, Section 1952(a)(3).

# **COUNT SEVENTEEN**

(Unlawful Use of Communication Facility)

On or about April 28, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, CHARLES WRIGHT, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count Three of this Indictment, that is Defendant, CHARLES WRIGHT, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

# **COUNT EIGHTEEN**

(Interstate Travel in Aid of Racketeering)

- 1. On or about April 28, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, **CHARLES WRIGHT**, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about April 28, 2016, Defendant, CHARLES WRIGHT, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendant, CHARLES WRIGHT, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Section 1952(a)(3).

## **COUNT NINETEEN**

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

- 1. On or about May 4, 2016, in Jefferson County, in the Northern District of West Virginia, Defendants, JOSEPH KILLIAN and BRANDON FRENCH, aided and abetted by each other, traveled in interstate commerce between the States of West Virginia and Maryland with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about May 4, 2016, Defendants, JOSEPH KILLIAN and BRANDON FRENCH, aided and abetted by each other did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, JOSEPH KILLIAN and BRANDON FRENCH, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

# **COUNT TWENTY**

(Distribution of Heroin)

On or about May 16, 2016, in Berkeley County, in the Northern District of West Virginia, Defendant, **GARFIELD MISSENIS**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance, to a person known to the Grand Jury, in exchange for a PlayStation; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

# **COUNT TWENTY-ONE**

(Unlawful Use of Communication Facility)

On or about May 30, 2016, in Jefferson County, in the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, **BRANDI KERN**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is Defendant, **BRANDI KERN**, used a telephone to facilitate the conspiracy to distribute and possess with intent to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

#### **COUNT TWENTY-TWO**

(Unlawful Use of Communication Facility)

On or about June 6, 2016, in Berkeley County, in the Northern District of West Virginia, and elsewhere, Defendant, **GARFIELD MISSENIS**, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count Seven of this Indictment, that is Defendant, **GARFIELD MISSENIS**, used a telephone to facilitate the distribution of heroin, the possession with intent to distribute heroin, and the conspiracy to distribute heroin; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

### **COUNT TWENTY-THREE**

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

- 1. On or about June 6, 2016, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other, traveled in interstate commerce between the States of Maryland and West Virginia with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about June 6, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, aided and abetted by each other, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **GARFIELD MISSENIS** and **MICHELLE ZIMMERMAN**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

# **COUNT TWENTY-FOUR**

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about June 6, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, STEVEN ROBINSON, a/k/a "H", GARFIELD MISSENIS, and MICHELLE ZIMMERMAN aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

#### **COUNT TWENTY-FIVE**

(Aiding and Abetting Interstate Travel in Aid of Racketeering)

- 1. On or about June 23, 2016, Defendants, **WAYNE KEGLEY** and **DONNA MILLER**, aided and abetted by each other, traveled in interstate commerce between the States of Maryland and West Virginia with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of an unlawful activity, namely a business enterprise involving the Controlled Substances Act offense charged in Count One of this Indictment.
- 2. Thereafter, on or about June 23, 2016, in Berkeley County, in the Northern District of West Virginia, Defendants, **WAYNE KEGLEY** and **DONNA MILLER**, aided and abetted by each other, did perform and attempt to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, that is, Defendants, **WAYNE KEGLEY** and **DONNA MILLER**, conspired to knowingly and intentionally possess with intent to distribute, and to distribute, heroin, a Schedule I controlled substance; in violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

# **COUNT TWENTY-SIX**

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about June 23, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, including Baltimore, Maryland, Defendant, STEVEN ROBINSON, a/k/a "H", WAYNE KEGLEY, and DONNA MILLER, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

# **COUNT TWENTY-SEVEN**

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about June 29, 2016, in Berkeley County, West Virginia, within the Northern District of West Virginia, and elsewhere, Defendants, **JOSEPH KILLIAN** and **AMANDA MARSHALL**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug-controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

# **COUNT TWENTY-EIGHT**

(Conspiracy to Launder Monetary Instruments)

- 1. Paragraphs 1 through 13 alleged in Count One above are incorporated herein by reference as if repeated and re-alleged in full.
- 2. From on or about August 20, 2015, and continuing to on or about the date of the return of this indictment the Defendants STEVEN ROBINSON, a/k/a "H", BRITTANY BROOKS, and TIARA ADAMS, did knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury to conduct unlawful financial and monetary transactions involving the proceeds of the conspiracy alleged in Count One in the Northern District of West Virginia and elsewhere, in violation of Title 18, United States Code, Sections 1956 and 1957.

# **OBJECTS OF THE CONSPIRACY**

- 3. An object of the conspiracy was to violate Title 18, United States Code Section 1956(a)(1)(A)(i) by knowingly conducting financial transactions affecting interstate commerce involving proceeds of the specified unlawful activity constituting the offense charged in Count One, with the intent to promote the carrying on of such specified unlawful activity.
- 4. An object of the conspiracy was to violate Title 18, United States Code Section 1956(a)(1)(B)(i) by knowingly conducting financial transactions affecting interstate commerce involving the proceeds of the specified unlawful activity constituting the offense charged in Count One, knowing that the transactions would be designed to

conceal and disguise the nature, location, source, ownership, and control of proceeds of said specified unlawful activity.

5. An object of the conspiracy was to violate Title 18, United States Code Section § 1957 by knowingly engaging in monetary transactions through and to financial institutions, affecting interstate commerce, in criminally derived property of a value greater than \$10,000 that had been derived from the specified unlawful activity constituting the offense charged in Count One.

#### MANNER AND MEANS OF THE CONSPIRACY

- 6. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:
- 7. It was part of the conspiracy that Defendant **STEVEN ROBINSON**, would cause and direct individuals to bring currency to him from the Northern District of West Virginia.
- 8. It was part of the conspiracy that Defendants STEVEN ROBINSON, BRITTANY BROOKS, and TIARA ADAMS, would use bank accounts and acquire assets such as real estate and vehicles, make payments on assets, and invest in businesses with currency derived from this illegal activity. Some of these businesses would then be used to launder the illegal proceeds. Some of these assets would then be used to further the specified unlawful activity constituting the offense charged in Count One. Some of the assets would then be placed in nominee names in order to conceal and disguise the nature, location, source, ownership, and control of the assets and proceeds of the specified unlawful activity constituting the offense charged in Count One.

- 9. It was further part of the conspiracy that Defendant **TIARA ADAMS** would deposit currency derived from the said specified unlawful activity constituting the offense charged in Count One into an account at PNC Bank.
- 10. It was further part of the conspiracy that co-conspirators would make deposit transactions of currency derived from the unlawful activity constituting the offense charged in Count One into an account at Bank of America opened in the name of PC Realty, LLC, and over which Defendants **STEVEN ROBINSON**, a/k/a "H", and TIARA **ADAMS** have signature authority. The currency derived from the unlawful activity constituting the offense charged in Count One would then be used to acquire assets.
- 11. It was further part of the conspiracy that co-conspirators would make deposit transactions of currency derived from the unlawful activity constituting the offense charged in Count One into an account at Wells Fargo opened in the name of Empire Estates, LLC, an entity that Defendants **STEVEN ROBINSON**, a/k/a "H", and TIARA ADAMS own.
- 12. It was further part of the conspiracy that **BRITTANY BROOKS** used currency derived from the unlawful activity constituting the offense charged in Count One to rent vehicles then used by Defendant **STEVEN ROBINSON**, **a/k/a** "H", to promote the carrying on of the unlawful activity constituting the offense charged in Count One.

# **OVERT ACTS**

- 13. In furtherance of the conspiracy, and to effect the objects thereof, a conspirator committed at least one of the following overt acts, and others:
  - 14. On December 10, 2015, Defendant, STEVEN ROBINSON, caused an

individual known to the Grand Jury to travel from Berkeley County, West Virginia to Maryland with \$3,000 in United States Currency.

- 15. On or about January 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$3,000 into an account at PNC Bank.
- 16. On or about January 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,000 into an account at PNC Bank.
- 17. On or about January 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$600 into an account at PNC Bank.
- 18. On February 16, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.
- 19. On or about February 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$5,000 into an account at PNC Bank.
- 20. On or about February 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$370.
- 21. On or about March 7, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$370 into an account at PNC Bank.
- 22. On or about March 7, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$20 into an account at PNC Bank.
- 23. On or about March 21, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$880 into an account at PNC Bank.
- 24. On or about March 7, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$220 into an account at PNC Bank.

- 25. On March 14, 2015, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.
- 26. On April 4, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 27. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,750 into an account at PNC Bank.
- 28. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$60 into an account at PNC Bank.
- 29. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$300 into an account at PNC Bank.
- 30. On or about April 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$100 into an account at PNC Bank.
- 31. On April 11, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 32. On April 15, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.
- 33. On April 18, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 34. On or about April 18, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$300 into an account at PNC Bank.
- 35. On or about April 18, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$240 into an account at PNC Bank.

- 36. On April 20, 2016, Defendant, **STEVEN ROBINSON**, caused an individual known to the Grand Jury to travel from Berkeley County, West Virginia to Maryland with \$400 in United States Currency.
- 37. On April 25, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 38. On or about April 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$980 into an account at PNC Bank.
- 39. On or about April 29, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$220 into an account at PNC Bank.
- 40. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,020 into an account at PNC Bank.
- 41. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,000 into an account at PNC Bank.
- 42. On or about May 2, 2016, Defendant **TIARA ADAMS** made a second cash deposit of \$1,000 into an account at PNC Bank.
- 43. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$820 into an account at PNC Bank.
- 44. On or about May 2, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$660 into an account at PNC Bank.
- 45. On May 16, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

- 46. On May 18, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC
- 47. On May 23, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 48. On June 1, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 49. On or about June 6, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,280 into an account at PNC Bank.
- 50. On or about June 6, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,870 into an account at PNC Bank.
- 51. On or about June 6, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$220 into an account at PNC Bank.
- 52. On June 9, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 53. On June 13, 2016, \$30,000 was received by wire transfer to an account at Bank of America opened in the name of PC Realty, LLC from Congressional Bank customer WWW Advantage Title, with instructions marked regarding BWS Holdings LLC.
- 54. On June 15, 2016, a cash deposit of \$500 was made into an account at Wells Fargo opened in the name of Empire Estates, LLC.
- 55. On June 16, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

- 56. On June 20, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 57. On or about June 22, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$300 into an account at PNC Bank.
- 58. On or about June 22, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$135 into an account at PNC Bank.
- 59. On June 27, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 60. On June 30, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 61. On or about July 5, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$3,100 into an account at PNC Bank.
- 62. On or about July 5, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$2,300 into an account at PNC Bank.
- 63. On or about July 5, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$100 into an account at PNC Bank.
- 64. On July 7, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.
- 65. On July 14, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

- 66. On July 15, 2016, \$30,000 was received by wire transfer to an account at Bank of America opened in the name of PC Realty, LLC from Wells Fargo Bank NA customer Style Stage Salon, LLC.
- 67. On July 21, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 68. On July 28, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 69. On August 4, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 70. On or about August 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,060 into an account at PNC Bank.
- 71. On or about August 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$1,000 into an account at PNC Bank.
- 72. On or about August 4, 2016, Defendant **TIARA ADAMS** made a cash deposit of \$340 into an account at PNC Bank.
- 73. On August 11, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.
- 74. On August 19, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 75. On August 25, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.

- 76. On September 1, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.
- 77. On September 8, 2016 Defendant **BRITTANY BROOKS** used a MasterCard credit card to rent a vehicle from Alamo.
- 78. On September 12, 2015, \$5,000 was wire transferred from an account at Bank of America opened in the name of PC Realty, LLC to D.R. Horton Crown Realty Professionals.
- 79. On September 15, 2016 Defendant **BRITTANY BROOKS** used a Visa credit card to rent a vehicle from Alamo.
- 80. On September 30, 2016, a \$30,000 cashier's check was drawn from an account at Bank of America opened in the name of PC Realty, LLC made payable to Capshaw Development.
- 81. On October 6, 2016, a \$3,500 cash deposit was made into an account at Bank of America opened in the name of PC Realty, LLC.
- 82. On October 6, 2016, \$75,000 was wire transferred from an account at Bank of America opened in the name of PC Realty, LLC to United Community Bank, Blairsville, GA, for the benefit of Welch, Webb & White.

All in violation of Title 18, United States Code, Section 1956(h).

## **FORFEITURE ALLEGATION**

## Controlled Substances Act Travel Act

- 1. Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Sections 841 and 846, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including, but not limited to: (1) \$4,500.00 in United States Currency seized from Charles Wright on May 31, 2016; (2) \$2,241.00 in United States Currency and miscellaneous tools described in Attachment A, seized from the residence of Garfield Missenis, Wayne Kegley, Michelle Zimmerman, and Donna Miller on June 23, 2016; (3) \$2,099.00 in United States Currency seized from the residence of Joseph Killian on June 29, 2016; (4) all funds contained in Bank of America account number XXXXXXXX0983, held in the name of Tiara Adams; (5) all funds contained in Wells Fargo account number XXXXXX7241, held in the name of Empire Estates, LLC; (6) all funds contained in PNC Bank account number XXXXXX4194, held in the name of Tiara Adams: and (7) a money judgment in the amount of at least \$300,000.
- 2. Pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 981(a)(1)(C), 1956(c)(7)(A), 1961(1), and Title 21, United States Code, Section 853, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code,

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BOSCH	FSF7911		2.5/8" TACHOMETER		WHITE CARDROARD BOX
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PITTSBURGH	67897		3/8" DRIVE 9 PC BOLT EXTRACTOR SET	•	BLACK TOOL BAG
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MILWAUKE			DRIVE/DRILL ATTACHMENTS IN BOX		BLACK TODE BAG
PHTSBURGH	67902		1/2" 13 PC IMPACT SOCKET SET		BLACK TOOL BAG
PITTSBURGH	62702		2 PC RUBBITR STRAP WRENCH SET		BLACK TOOL BAG
WARRIOR	60475		6 PC WIRE WHEEL & CUP BRUSH SET		BLACK TOOL BAG
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ASSORIED SCHEW DRIVERS 10 PE KTRALONGW WRINCH SET 11 PECING HANDIE WINCH SET 12 PECING HANDIE WINCH SET 13 PECING HANDIE WINCH SET 14 PECING HANDIE WINCH SET 15 PECING HANDIE WINCH SET 16 PER TOOL CUTTER 17 PER TOOL CUTTER 18 PECING HANDIE SET 18 PECING HANDIE	PROJECT PRO			SAMPLY RONG PULLED SELL		SWALLER TOOL CHEST
ASSORIED SCHEVE DRILLER ST  10 PC EKTRALONIK WRENCH ST  11 PC CAN FORT DRILLER ST  12 POUT CUITE  4 PC BALLOFEN HAMMER ST  ADUSTAGL WE GEPP  PRY TOCI  CLAMPS  STEINOSCOPE  14 SOCKT ADAPTERS  MANUAL DRILL  25 TAPE MASSUR  ASSORIED PRESS BLOCKS  ASSORIED PRESS BLOCKS  ASSORIED PRESS BLOCKS  ASSORIED PRESS BLOCKS  BRAKE PART CLIANER  BRAKE PART CL	PITTSBURGH			1 1 2 4 1 1 4 6 4 4 5 4 4 5 4 5 4 5 4 5 4 5 4 5 4 5		Sanutan 1001 Ches
10 PC SPILT DWILD BRITT 15 PC SPILT POWIT DRILL BIT ST 15 PC SPILT POWIT DRILL BIT ST 15 PC SPILT POWIT DRILL BIT ST 15 DWILD BRITT 15 PC SPILT POWIT DRILL BIT ST 15 DWILD BRITT 15 DWILD BWILD BWING	PITTSBURGH			SCHOOLS ACTIONS AS A STATE OF THE STATE OF T	7.1	SMALLER TOOL CHEST
43067	ATUO CRAFT			ASSUMED ACREA DRIVES	<i>,</i> ,	CARALLER TOOL CUEST
75000	AUTO CRAFT			10 PC EXTER LIBRA WATERED SET		SAMBLER TOOL CHEST
190Cr	ATUO CRAFT			13 TO STATE TOWN DATE OF THE		SAME TOOL CHEST
	PITTSBURGH	47067		AA PALKANIA MANAMA MANAMA AM		CMARIER TOOL CHEST
	CALHAWK			THE SHAMASH MARKET AS DO A		SMALLER TOOL CHEST
				Annichasif vier Gaip		SMALLER TOOL CHEST
				SECTION TO SECTION SEC		SMALLER TOOL CHEST
			•	STAMPS	~	SMALLER TOOL CHEST
				SIETHOSCOPI		SMALLER TOOL CHEST
				FLEX SOCKET ADAPTERS	~	SMALLER TOOL CHEST
				MANUAL DRILL		SMALLER TOOL CHEST
	Hophastia		•	25' TAPE MEASURE		SMALLER TOOL CHEST
20 40				ASSORTED PRESS BLOCKS	రు	SMALLER TOOL CHEST
			-	ASSORTED CABLE TIES	. 100	SMALLER TOOL CHEST
			•	BONDO BODY FILLER CANS	~	SMALLER TOOL CHEST
	CARGUEST		ă.	BRANE PART CLEANER	~	SMALLER TOOL CHEST
	FAST ORANGE			HAND CLEANER	~	SMALLER TOOL CHEST

KOKKE HISH			מוזומאטא ווירו		CARALLES TOTAL	
GREATVALLE			GOW INCHT BILBS		SMALLER TOOL CHEST	HEST
			10 PCK SHOP TOWERS		SMALLER TOOL CHEST	HEST
-	60647		17 5X2.75 SANDING SHEET 25 PCK 36 GRIT	.,	SMALLER TOOL CHEST	544
	69588		16x2 75 5 PACK 60 GRIT SANDING SHEET		SWALLER TOOL CHEST	HEST
	69810		3 2/3X9 60 GRIT 6 PCK SAMDING SHEET	•	SWALLER TOOL CHEST	HEST
	69943		3 2/3X9 150 GRIT 6 PCK SANDING SHEET		SMALLER TOOL CHEST	HEST
	69813		4.5X5.5 150 GRIT SANDING SHEET 6 PCK		SMALLER TOOL CHEST	HEST
•	60229		6" 60 GRIT SANDING DISC 25 PACK		SMALLER TOOL CHEST	HEST
	60227		6" 120 GRIT SANDING DISC 25 PACK		SMALLER TOOL CHEST	HEST
	Z6669		6" 80 GRIT SANDING DISC 25 PACK	٠.	SMALLER TOOL CHEST	HEST
	63683		S PCK 2" TWIST LOCK FIBER DISCS	•	SMALLER TOOL CHEST	HEST
	99519		SPECK 3" TWIST LOCK FIBER DISCS	-	SWALLER TOOL CHEST	HEST
,			SOUNTED SWALL SANGING DISCS		SMALLER TOOL CHEST	MESI
	/515		TO PURK 2 STREETING DISKS ON		SMALLER FOOL CHEST	HEST
	Space		S PLK NUBBER LUARRED CLAMPS		SMALLER TOOL CHEST	HEST
			AIR HOSE OBANGE W/ CONNECTOR VOLVES		SWALLER LOUL CHEST	HEST.
Cau tan Mass			A POST TOOLDON WILL AND ANTACHREENING		TABLE TOOLDON BIT	TITE CONT
GENERAL PRO			UARGE IDOLGOA W/ 4 ATTACHWENTS		LAKGE ICALIGIX RIGHT SIDE	ACK THE
PITTSHIRGH	4111		TAPE REPORT DIRECTION STREET		SOR THOSE MODERN BIGHT SIDE	3015,111
ACTRON	CP7529		DIGITAL TIMING HENT	-	TARGET TOOLBOX BIGHT GIRE	MT GIR
GEAR WRENCH	85590		RATCHETING/WHENCH SET S PC		LARGE TODIBOX RIGHT SIDE	HT SIDE
GEAR WRENCH	18558		RATCHETING/ WRENCH SET 5 PC		LARGE TOOLBOX RIGHT SIDE	HTSIDE
ULTRA STEEL	UWSIBATA		RAICHETING/WRENCH SET 7 PC		LARGE TODUBOX RIGHT SIDE	HT SIDE
BAYCO			13W FLOURESCENT WORK LIGHT		TARGE TOOLBOX RIGHT SIDE	HIT SEDE
1.700M			GREEN WORK LICHT		LARGE TOOLBOX RIGHT SIDE	HT SIDE
AUTOCRAFT	AC636		TORQUE ANGLE GUAGE		LARGE TOOLBOX RIGHT SIDE	HT SIDE
DRITIMASTER	97626		SO PC ROTARY DRILL SET		LARGE TOOLBOX RIGHT SIDE	HT SIDE
MAKITA		375305	SKII SOW W 7 BLADES		LARGE TOOLBOX RIGHT SIDE	aus Ins
WEATHERX	WR18212		EMERGENCY FLASH LIGHT/RADIO	,	DAKGE TOOLBOX RIGHT SIDE	HT SIDE
CRAFTSMAN	315114231	65809	SMI SAW IBV		LARGE TOOLBOX RIGHT SIDE	HI SIDE
BIACK & DECKER			PALM SANDER		LARGE TOOLBOX RIGHT SIDE	SHT SIDE
			LEATHER LUCI BLL! W/ MISL HEMS		LARGE IDOLEDA RIGHT SIDE	HI SIDE
SNAPCON	M1952		INDUCTIVE AMP VOLTIME IER		LAKGE 1001.BOX KIGHT SIDE	10%) 16
	.4-		ASSOCIATE SPIKAY GUNA	_	LAPAGE TOOLIGON KIGHT STOE	20%
CONTRACTO		000000000000000000000000000000000000000	CHEN THE LONGO WARNER IN CASE		LANGE HOURDA MIGHT SIDE	14 500
CHARLES ASSESSED		3/139/203	ASSESSED LOSSES		TARGE TOOLBOX BIGHT SIDE	MT SUD
Canim	832321		SAW DIADES		S LARGE TOOLBOX RIGHT SIDE	HI SIDE
			ANGLE MEASURE W/ RED BAR		i	HT SIDE
DEWALL	DCS380	338661	SAW SAW		LARGE TOOLBOX RIGHT SIDE	HT SIDE
DEWALL	DCF885	293763	20 V CORDLESS IMPACT		LARGE TOOLBOX RIGHT SIDE	HT SIDE
DEWALT	DC1040		20 V WORK HIGHT		LARGE TOOLBOX RIGHT SIDE	HI SIDE
DEWALT	DCD985	216536	20 V 1/2 DRILL/DRIVER HAMMER		LARGE TOOLBOX RIGHT SIDE	HT SIDE
DIWALL			14 PC DRILL BIT SET 3/8" IN CASE		LARGE TOOLBOX RIGHT SIDE	IGIS IHS
DEWALT	~26		36 PC DRILL BIT SET 3/8" IN CASE		LARGE TOCICON RIGHT SIDE	HT SIDE
DEWALT	· Carr		TODI, BAG		LARGE TOOLBOX RIGHT SIDE	HT SIDE
	A 7941		METAL STAND	•	LARGE TODIBOX RIGHT SIDE	SHT SIDE
	,		7 DRIVERS AND 3 TWEEZERS IN LEATHER CASE	-	LANGE TOOLBOX MIGHT SIDE	AT SIDE
AUTOCOATS	102501		CHAINE MACHINER AND MINISTER SWITCH		LARGE TOOLGON BIGHT SIDE	200
AUTOCRAFT	255		DITMAN ARM PRICES		IARSE TODIBOX RIGHT SIDE	HT
AUTOCRAFI	AC3370		THE ROD END PULLER		LARGE TOOLBOX RIGHT SIDE	HT SID
AUTOCIART	AC3260		PISTON RING PULLER		LARGE TOOLBOX RIGHT SIDE	HI SIDE
AUTOCRAFT	AC527		ENGINE CYLINDER HONE		LARGE TOOLBOX RIGHT SIDE	HT SIDE
AUTOCRAFT	AC559		BRAKE CYLINDER HONE		LARGE TOOLBOX RISHT SIDE	SHT SIDE
	1		PISTON RING COMPRESSOR		LARGE TOOLBOX RIGHT SIDE	305 146
	MP1300		SADIATOR PRESSURE RESIEM IN CASE		LANGE FOOLBOX RIGHT NDE	TON IN
COLUMN CONNEX	A724574		WATER PUMP SOCKET		I ARGE TOOLBOA MOHI SIDE	105 11
			GRAY SQUEEZE TOOL BRAKE COMPRESSOR		LARGE TOOLBOX RIGHT SIDE	HI SIDE
			ASSORTED AIR VALVE ATTACHMENTS		LARGE TOOLBOX RIGHT SIDE	HT SIDE
PITTSBURGH			20 PCJUMBO SOCKET SET W/ BLACK CASE	,	LARGE TOOLBOX RIGHT SIDE	HI SIDE
PERFORMANCE TOOL	•		TORQUE WRENCH W/ ORANGE CASE		LARGE TOOLGOX RIGHT SIDE	HI SIDE
			The state of the s			

PHISBURGH DOB SWART PHISBURGH CAL-HAWK ALIOCEAST PHITSBURGH MAC TOOL SWESTECH LOB SWART PHISBURGH RYOBI RYOBI AC PRO RHITAL PHEUMATIC RHITAL PHEUMATIC RHITAL PHEUMATIC RE CAL-HAWK LB CAL-HAWK DROJECT SOURCE	655011 655074PA 655074PA 58135 CAHIDDA	3500915.25 3602745.2015 3602745.2015 3602745.2015	A 2 DRIVE P FOR MANAGES WIVET SETS  1/2 SPHINE SOCKET SET  1/2 SPHINE SOCKET SET  BATTEN COPIESTS  4 PC 1/2 DREP SPHINE ASSE NOT SOCKET SET  ASSORTED AUTOCRAFT SOCKETS  SOCKET ADAPTERS  SOCKET ADAPTERS  ASSORTED VICE GRIPE  ASSORTED CHANNEL LOCKS  NETOLE NOSE PLIER  ASSORTED FROM HIRED TOCKS  MAND TROOL  POWANT TOCK  POWANT TOCK	- m	LARGE TOOLBOX RIGHT SIDE LARGE TOOLBOX RIGHT SIDE LARGE TOOLBOX RIGHT SIDE LARGE TOOLBOX RIGHT SIDE
JOB SWART PITTSBURGH CAL-HAWK AUTOCRAFT PITTSBURGH MAC TOOL SWISS TECH JOB SWART PITTSBURGH RYOB! RYOB	NABESSO 96363 SR136 CAV190A	3602703.535 3602703.535 3603.53.38	DEP WANGT SOCIET SET  1/2 SPINE SOCIET SET  PATTER VOH BATED WORK LIGHTS  4 PC 1/2 DEEP SUMUE AALE NOT SOCKET SET  ASSORTED AUGE GRIPS  CAMIN VOTG GRIP  ASSORTED VICE GRIPS  CAMIN VOTG GRIP  ASSORTED FER DI MADDED TOULS  MAUNTI TOOL  MAUNTI TOOL  PPCSATREW DINNER SET	nt.	LARGE TOOLBOX RIGHT SIDE LARGE TOOLBOX RIGHT SIDE LARGE TOOLBOX RIGHT SIDE
CAL-HAWK AUTOCRAFT PHTSBUSH MAC TOOL SWISS TECH JOB SAMRT PHTSBURGH RYDBI ACPRO PHTSBURGH PROMATIC PHTSBURGH DOB SMART PHTSBURGH PHOPECT SQUECK	BSSANAPA SR13f CAV190A	360215.75 3602703.015 3605.57.38 9605.57.38	PATITIEN OPPRATED WORK LIGHTS  ASONID AUTOCRAFT SOCKET SET  ASSONID AUTOCRAFT SOCKET SET  SOCKET ARAPITES  SWINGL ADAPITES  ASSONITED VICE GRIPS  CAMIN VICE GRIPS  CAMIN VICE GRIPS  ASSONITE OF ANNUEL LOCKS  NETOLE NOSE PLIER  ASSONITE BED HANDLED TOULS  MAUNTI TOOL  PPCSATRW DIVINER SET	m.	LARGE TOOLBOX RIGHT SIDE
CAL-HAWK AUTOCRATT PITTSBURGH MAC 100L STEELTON SWIES TECH JOB SAMRT PITTSBURGH RYDBI RYDB	BSSANAPA SR13f CAH190A	35C091575 36C27C32C0315 36C627C32C0315 36C627C32C0315 36C627C32C0315	APC 1/2 NETP SENROLE AXLE NOT SOCKET SET ASSORITED AND CORATS SOCKETS SOCKET ADAPTERS SWIVEL ADAPTERS ASSORITED VICE GRIPS CANNOT CHANNEL LOCKS NETPLE NOSE PLER ASSORITED ERD HANDLED TOOLS MAUNT TOOL		The state of the s
AUTOCRAFT PITSBUIGH MACTOOL SWIESTCH JOB SWART PITSBUIGH RYOBU RYO	SR13F	350915.25 3602745.2015 3605.17.38 915.05 HE306	ASSORIED AUTOCOATS SOCKETS SOCKET ADAPTERS SOCKET ADAPTERS SOCKET ADAPTERS SOCKET ADAPTERS ASSORTED VICE GRIPP ASSORTED FAMILIE LOKS NETOLE NOSE PLIER ASSORIED RED HANDLED TOOLS POCKET FOUR TITLES POCKET FOUR TOOLS POCKET FOUR TOOLS POCKET FOUR TOOLS  AND TOOL  POCKET FOUR TOOLS  POCKET FOUR TOOLS		LARGE TOOLBOX RIGHT SIDE
PITSBUAGH MAC TOOL SWESTECH JOB SAMRT PITSBURGH RYOB! RYOB! RITAL PREUMATIC HITAL PREUMATIC HITAL PREUMATIC RHITAL RHITAL PREUMATIC RHITAL RHITAL PREUMATIC RHITAL RHITAL PREUMATIC RHITAL RHI	SR137 CAM190A	3500915.25 3602745.2015 2605515.38	SOCKET ADAPTERS SOCKET ADAPTERS ASSORTED VICE GRIP ASSORTED PARMINELLOKS NETROITE OF BRIP ASSORTED FROM WILL TOOL ASSORTED FROM TOOLS ASSORTED FROM TO	10	
MAC TOOL STEELON SWESTECH SWESTECH BY STECH PITSBURGH RYOBI AC PRO PROBE BY FORMATIC BY FOR	SR13F CAH190A	3500915.25 3602705.2015 36053743.88	ASSORTED VICE GRIPS ASSORTED VICE GRIP ASSORTED CHANNEL LOCKS NETFILE NOSE PLIER ASSORTED RED HANDLED TOCKS NATURI TOCK PARTINE OF STANDING SET	m:	LARGE TOOLBOX RIGHT SIDE
SYFELTON SWISS TECH JOB SWART PROBLEMANT RYDBI RYDBI MITAL PHEUMATIC RITRAL PHEUMATIC RITRAL PHEUMATIC ATTYREBURGH JOB SMART PROJECT SQURCC	SR136 CAV190A	3507915.75 3602707.2015 3605.517.38	ASSORTED GRAPA  ASSORTED GRAPA  ASSORTED GRAPA  ASSORTED GRAPA  ANUAL TOOL  PPCS GRAPA DIVINER SET	;	LAKAE TOOLBOX RIGHT SIDE
STELTON SWISS TECH TOB SWART PITTSBURGH RYOBE  ACPRO PITTSBURGH ADB SMART PROJECT SQURCC	SR13F Cah190a	85.715.005E 25.215.005E 25.215.005E	ASSORTED CHANNEL LOCKS NIFDLE NOSE PLIER ASSORTED ET MAUDED TOOLS MULTI TOOL POSSORTED RES		•
SYEELTON SWISS TECH JOB SWART PITSBURGH RYDGI RY	SR138 Cah199a	3500315.25 3602745.20.8 3602745.09.8	NEFOLE NOSE PLIER ASSORIED RED HANDLED TOOLS MAUNTI NOOL 9 PCS REV DIVINER SET	7	LARGE TOOLBOX RIGHT SIDE
SWISS TECH TOB SWART PITTSBURGH RYDBI AC PRO	SR137 CAM190A	3500915.25 3602745.2015 2605.515.38 HE'SOE	ASSORTED RED HANDLED TOOLS MULTI TOOL  9 PC SCREW DRIVER SET		LARGE TOOLBOX RIGHT SIDE
NAMES TECH PURS STECH PURS SANRT	SR137 CAM190A	3500915.25 3602705.2015 2605515.38 H8506	9 PC SCREW DRIVER SET	2	LARGE TOOLBOX RIGHT SIDE
THE SWARD PROSE  AC PRO  AC PRO  CAL-HAWK  CAL-HAWK  LOB SMART  PROJECT SQUIRCE	SR13F CAH190A	3602703.205 3602703.2015 3605.513.38	are Annew Constant		LARGE TOOLBOX RIGHT SIDE
ACPRO ACPRO INTIAL PHEUMATIC INTIAL PHEUMATIC CAL-MANY DOB SMART PROJECT SQURCE	SR136 CAV190A	86216002E 86216203E 8602602E 8602602E	ASSORTED SCREW DRIVERS	K	LARGE TOOLBOX RIGHT SIDE
ACPRO RITIAL PHEUMATIC RITIAL PHEUMATIC RECALHAWK CALHAWK LOB SMART DOB SWART	SR138 CAH190A	30596 \$105457509E \$105457509E	DANVER BITS	} ~	*
ACPRO INTRAL PHEUMATIC ENTRAL PHEUMATIC IR CAL-HAWK TOB SMART TOB SMART	SR137 CAN190A	36,215,005E 36,02,02,005E 36,02,02,005E	ASSORTED SETS OF BITS		
AC PRO LITERAL PREUMATIC REFIRAL PREUMATIC REFIRAL PREUMATIC REFIRAL PREUMATIC REFIRAL PREUMATIC PREUF SOURCE PROFECT SOURCE	SR137 CAH190A	3500915.25 3602745.2015 2605.513.8 H8506	ASSORTED LOOSE BITS	16	
ACRO CUNTRAL PREUMATIC CUNTRAL PREUMATIC REPRESEUROR PRITSBURGH JOB SMART PROJECT SOURCE	SR135 SR135	3500915.75 3602705.0015 2605.513.38 H8506	ASSORTED SCREW DRIVERS IN HOLDER	m	
ENTIAL PHEUMATIC ENTRAL PHEUMATIC IR CAL-PANYK PITTSBURGH LOB SMART PROJECT SQURCE	SR13F CAM190A	36027452015 36027452015 36035338	TAD AND DIE CET IN DED CACE		TABLE TOOLBOX RIGHT SIDE
IN THE PREUMATIC  IR  CAL-LAAWK  CAL-LAAWK  JOB SMART  PROJECT SQUINCE	SR13F CAN190A	3602745.2015 3605575.38 HG506	EASTWOMEN SET IN NEU CASE		TABLE TOOL BOX NIGHT SIDE
IR CAL-HAWK DITTSBURĞH JOB SMART PROJECT SQURCE	SR13F CAH190A	36055338 H0506	STRAIGHT INE AR SANDER		IARGE TOOLBOX RIGHT SIDE
CAL-MANY PRITSBURGH JOB SMART PROJECT SQURCE	сантром	360553538 H050 <b>5</b>	IMPACT AIR TODE	·•	LARGE TOOLBOX RIGHT SIDE
PITSBURGH JOB SMART PROJECT SQURCE		360551538 H0506	9 PC AIR HAMMER SET		LARGE TOOLBOX RIGHT SIDE
PRTSBURGH JOB SMART PROJECT SQURCE		H0505	air paim sander metai		LARGE TOOLBOX RIGHT SIDE
PITTSBURGH JOB SMART PROJECT SQURCE			PHELIMATIC DISC SANDER		LARGE TOOLBOX RIGHT SIDE
PITTSBURGH JOB SMART PROJECT SQURCE			PAEDWATIC WRAIGHET NO SA		LARGE TOOLBOX RIGHT SIDE
JOB SMART PROJECT SOURCE			ARIST ASSORTED SOAP TAPE TODIS, AND MISCHINS		LARGE TOOLSON RIGHT SIDE
PROJECT SOURCE			IS PC HEX KEY SET		LARGE TOOLBOX RIGHT SIDE
PROJECT SOURCE.			TAP MEASURE	4	LARGE TOOLBOX RIGHT SIDE
			FILE SET IN SIEEVE		LARGE TOOLBOX RIGHT SIDE
			12 PC NEEDLE FILES	,	
			ASSOCIATION WAS INCHES	2 <	LARGE LUCHBOX RIGHT SIDE
			ASSOCIATED PARENCES ASSOCIATED PHES	, w	LARGE TOOLBOX RIGHT SIDE
PUTSBURGH			4 PC PICK SET		LARGE TOOLBOX RIGHT SIDE
CALHAWK			14 PC HEAVY BUTY PUNCH AND CHISEL SET IN SLEEVE		LARGE TOCHBOX RIGHT SIDE
			ASSORTED CHISELS	2 :	
, ingles — system, s			ASSORTED PUNCHES ASSORTED BICKS	× ×	LARGE TOOLBOX RIGHT SIDE
		-	DRIL BITS	~	•
			27 PC LETTER DIE SET	7	•
SURE BUILT		-	RAZOR BLADE 100 CT		LARGE TOOLBOX RIGHT SIDE
AUTOCRAFT	AC356		9 PC IMPACT SOCKET SET		LARGE TOOLBOX RIGHT SIDE
DEWALT			3" BRUSH ATTACH		LARGE TOOLBOX RIGHT SIDE
DEWALT			A" STAINLESS STINGER WHEEL		CARGE TOOLBOX RIGHT SIDE
XACTO KNIFE			CHINA WOOD BOX 13 PC		LARGE TOOLSON BIGHT SIDE
2 <b>18</b> 10		· ·	STACING GENERAL GRANDER	¥: ¥	į.
1 Had Gatte		2015.2031	DISC GRINDER (elec.) W/ GUARD AND TOOL		1
DEWALT			GRINDER TOOL (clec) W/ DISC WRENCH NO 5#		LARGE TOOLBOX RIGHT SIDE
PITTSBURGH	87928		8 PC 3/8 DEEP IMPACT SOCKET SET		BOTTOM TOOLBOX
PITTSBURGH	67910		8 PC 3/8 DEEP IMPACT SOCKET SIT		BOTTOM TOOLBOX
PITTSBURGH	67929		7 PC 3/8 SWIVEL IMPACT SOCKET SET		BOTTOM TOOLBOX
PITTSBURGH	67908		7 PC 3/8 SWIVEL IMPACT SOCKET SET		BOTTOM TOOLBOX
KOBALT	7337620		9 PC UNIVERSAL SOCKET SET	7.00	BOTTOM TOGLBOX
KOBALT	737621	rē.	2/8 11 PC UNIVERSAL SOUNE   SE		SOLITON TOOLSON
KOBALT	338531		3/8 13 PC IMPACT SOCKET SET		ROLLON TOOLION
ROSALI	61345	A September 1997	1/4 10 PC CHROME DEEP WALL SOCKET SET		BOTTOM TOOLBOX
PITTSBURGH	61333	··· -•	1/4 10 PC CHROME DEEP WALL SOCKET SET		BOTTOM TOOLBOX
PITTSBURGH	01896		3/8 7 PC SPLINE SOCKET SET		BOTTOM TOOLBOX

BOTTOM TODIBOX	ROTTOM TODINOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	KORICOT MOTTOR	ROTTOM TODI BOX	DOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTON TOOLBOX	BOILDING LOOK BOX	BOTTOM TOOLBOX	HOTTOM TOOLBOX	BOTTOM TOOLBOK	BOTTOM TOOLBOX	ROTTOM TODIBOX	воттом тооцьох	BOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	воттом тоотвох	norrow Toolnox	ROTTOM TOOLBOX	ROTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	SOTTOM TOOLSOX	воттом тооцоох	ROLLON TOOLBOX	ROTTOM TOOLBOX	коттом тоотвох	BOTTOM TOOLBOX	ROTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	ROTTOM TOOLSOX	ROTTOM TOOLBOX	ROTTOM TOOLBOX	ROTTOM TOOLBOX	SOTION TOOLBOX	BOTTOM TOQUBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	BOTTOM TOOLBOX	холоот моттов	BOTTOM TOOLBOX	воттом тооцвох	ROTTOM TOOLBOX	ROTTON TOOLBOX
, ned					75	~			~ \$	eş	ę		!				:	: ~	==			ō			~	~									6	9							2				o m				~	
5/6 HATCHET MICHOMETER TORGOE WRENCH 5 PC DEEP WALL BOLT GRIP IN BE CASE	22 PC RAICHET SOCKET SET	48 PC BLACK/CHROME SOCKET SET	8 PC ELECTRICAL CONNECTORS	MANUAL DRILL	ASSORTED RATCHETS	OPEN SIDE SOCKETS	CHROME SOCKET ADAPTER	MINI FLASHLIGHT	ACCOUNTS COUNTY ADMITTED	CONTRET DEBUTE	ACCORTED SOCKETS	ASSORTED SOCKET EXTENSIONS	STUBBY COMBO WRENCH SET 7 PC.	4 PC BOX END WRENCH SET		6 PC COLORED WRENCH SET	S PC RAICHETING COMBO WRENCH SET	ASSORTED	ASSORTED RATCHETING WRENCHES	22 PC COMBO WRENCH SET	7 PC STUBBY RATCHETING COMBO WRENCH SET	WRENCHES	5 PC RATCHETING/COMBO WRENCH	STUBBY COMBO WRENCH SET	ASSORTED WRENCHES	ASSORTED RATCHETING WRENCHES	STRAY PATEN WRENCH BOX OF SOCKETS	60 PC TAP AND DIE SET	9 PC DOUBLE FLARING TOOL KIT TOROIT WRENCH	1 J/2 LARGE WRENCH	SPANK PLUG REPAIR KIT	HINTAD REPAIR SYSTEMS	PLUG SAVER	DRILL AND TOOL SCREW ENTRACTION	DRILL AND TOOL SCREW ENTRACTOR	CLUTH ALIGNMENT TOOL	CAM CRANK SHAFT SEAL PULLER	2 PC TAN CLUTCH WRENCH SET	ROLL CULTER	BLACK PULLER TOOL 18 PC DISC BRAKE PAD TOOL KIT	IR-CAR USED STERED	10 PC SPIRAL EXTRACTOR BIT SET	ASSORTED EXTRACTOR BITS	1" SILVER AND DEMING	9/16 SILVER AND DEMING	16 PC DRILL BIT SET	ASSORTED DRILL BITS ASSORTED DRILL BITS	1/2 DRIVE DIGITAL TORQUE ADAPTER	FAT BRUSH 18 V TORONE DRILL W/ CHARGER IN BOX	MISC DOCUMENTS AND MANUALS	SMALL JEWELER BAGS	5 PC DOUBLE END FLAIR NUT
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BEAR WINGWOOD					t design of
•			ASSSORTED WRENCHES	 	SOTTOM TOOLBOX
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			ASSORTED COMPRESSION TESTER	m	SOTTOM 100(BOX
AUTOCRAFT	AC525		S PC STEFRING PUMP PULLEY KIT		BOTTOM TOOLBOX
CAL-VAN	161		AUTO IN INE FLARE TOOL		ROTTOM TOOLBOX
NOWER BUILT			SCREWRIT		BOTTOM TODIBOX
		•	6 PC PLASTIC HTTING SET	•	жовтом тоотвох
			MISC TOOLS	g	BOTTOM TOOLBOX
AUTOCRAFT	AC580	- market	HARMON BALANCER PULLER SET		BOTTOM TOOLBOX
AUTOCRAFT	AC509	-	TIMING GEAR PULLER		BOTTOM TOOLBOX
AUTOCRAFT	AC578	magazini.	3 PC STEFRING LOCK PLATE REMOVER		SOTTOM TODLEDX
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			ASSORTED SCRAPES	4	LEFT SIDE TOOLBOX
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			T. HANDLE		LEFT SIDE TOOLBOX
*			WORKZONE DIGITAL CALIBER	4	(EFT SIDE TOOLBOX
-			ASSORTED CRESCENT WRENCHES	11	LEFT SIDE TOOLBOX
PITISBURGH	67890		7 PC LONG REACH HEX BIT SET		LEFT SIDE TOSLEDOX
PITTSBURGH	67689		7 PC LONG REACH HEX BIT SET		LEFT SIDE TOOLBOX
PITTSBURGH	61335		1/2 B PC HAPACT HEX DRIVE SET		LEFT SIDE TOOLBOX
PITTSBURGH	61337	-	1/2 B PC IMPACT HEX DRIVE SET	-	LEFT SIDE TOOLBOX
PITTSBURGH	61336		1/2 8 PC IMPACT STAR SOCKET SET		LEFT SIDE TOOLBOX
JOB SMART	1038285		6 PC STAR BIT SOCKET SET		LEFT SIDE TODIBOX
GEAR WRENCH			10 PC STAR BIT SOCKET SET		LEFT SIDE TOOLBOX
MECH POWER			DRILL BIT SET (most missing) ORANGE CASE	•	CEFT SIDE TOOLBOX
		•	ASSORTED VOLT TESTERS	'n	LEFT SIDE TOOLBOX
CENTLCH	66806	MARCO 1.1	7 FUNCTION DIGITAL MUTI METER		(EFT SIDE TODI, BOX
_			ASSORTED HAMMERS	17	LEFT SIDE TOOLBOX
AUTOCRAFF	AC390		7 PC BEARING RACE AND SEAL DRIVER'S SET		KCB1CD1 IGIS 1131
CHICAGO ELECTRIC		363361517	IS V DRILL		(EFT SIDE TOCLBOX

Section 1952, or a conspiracy to violate such offense, including, but not limited to, \$2,241.00 in United States Currency and miscellaneous tools described in Attachment A,

seized on June 23, 2016.

3. Pursuant to Title 18, United States Code, Section 982(a)(1) and Title 18,

United States Code, Section 1956, the government will seek the forfeiture of property as

part of the sentence imposed in this case; that is, the forfeiture of any property, real or

personal, involved in such offense, and any property traceable to such property,

including, but not limited to: (1) all funds contained in Bank of America account number

XXXXXXXX0983, held in the name of Tiara Adams; (2) all funds contained in Wells Fargo

account number XXXXXX7241, held in the name of Empire Estates, LLC; (3) all funds

contained in PNC Bank account number XXXXXX4194, held in the name of Tiara Adams;

and (4) a money judgment in the amount of at least \$300,000.

4. Pursuant to Title 18, United States Code, Section 982(b)(1), and Title 28,

United States Code, Section 2461(c), the government will seek forfeiture of substitute

property up to the value of property subject to direct forfeiture that is not available for

forfeiture on account of any act or omission contemplated by Title 21, United States Code,

Section 853(p)(1).

A True Bill,

/s/
Grand Jury Foreperson

/e/

William J. Ihlenfeld, Il United States Attorney

Anna Z. Krasinski, Assistant United States Attorney Stephanie S. Taylor, Special Assistant United States Attorney